

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

Case No. 213-CR-418 (TJM)

INDICTMENT

V.

**Violations: 18 U.S.C. § 1513(e):
[Retaliation Against
a Witness]
18 U.S.C. § 2261A(2):
[Interstate Stalking]**

PAUL RAYMOND ROSS,

Defendant.

2 Counts [Broome County]

THE GRAND JURY CHARGES:

General Allegations

At all times material to this Indictment:

1. PAUL RAYMOND ROSS, the defendant in this Indictment, resided in Endwell, New York, within the Northern District of New York.
2. The victim, whose initials were "K.O.D.," resided in the State of Pennsylvania.
3. These general allegations are herein incorporated into Counts One and Two of this Indictment.

COUNT 1
(Retaliation Against a Witness)

From on or about July 18, 2013 until on or about October 16, 2013, in Broome County in the Northern District of New York and elsewhere, the defendant, PAUL RAYMOND ROSS, did knowingly and with intent to retaliate take actions harmful to K.O.D., including interference with K.O.D.'s lawful employment and livelihood, for K.O.D. having providing to a law enforcement officer truthful information relating to defendant PAUL RAYMOND ROSS's commission of a

federal offense. Among other things, defendant PAUL RAYMOND ROSS posted threatening photographs and slogans, as well as false statements about K.O.D., on Facebook webpages and used Facebook and other means to disseminate false and derogatory information about K.O.D. and K.O.D.'s business to people and entities who were actual or potential customers of K.O.D.'s business, her employees, and media outlets, all with intent to retaliate against and harm K.O.D. for having provided truthful information to the Federal Bureau of Investigation, resulting in defendant PAUL RAYMOND ROSS being convicted in 2008 for making extortionate threats in the case of *United States v. Ross*, Case No. 07-CR-572.

In violation of Title 18, United States Code, Section 1513(e).

COUNT 2
(Interstate Stalking)

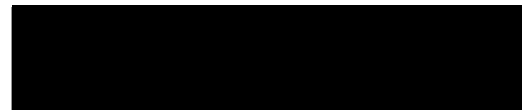
From on or about July 18, 2013 until on or about October 16, 2013, in Broome County in the Northern District of New York and elsewhere, the defendant, PAUL RAYMOND ROSS, with intent to harass, injure, and intimidate K.O.D., used the mail, an interactive computer service, an electronic communication service, and other facilities of interstate commerce to engage in a course of conduct that caused substantial emotional distress to K.O.D., who resided in another state. Among other things, defendant PAUL RAYMOND ROSS posted threatening photographs and slogans, as well as false statements about K.O.D., on Facebook webpages and used Facebook and other means to disseminate false and derogatory information about K.O.D. and K.O.D.'s business to people and entities who were actual or potential customers of K.O.D.'s business, her employees, and media outlets.

In violation of Title 18, United States Code, Section § 2261A(2).

Date: October 31, 2013

A TRUE BILL

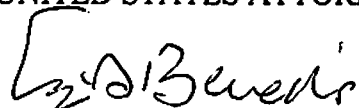
NAME REDACTED

A large black rectangular redaction box covering the signature of the foreperson.

/FOREPERSON

RICHARD S. HARTUNIAN
UNITED STATES ATTORNEY

BY:

A handwritten signature in cursive script, appearing to read "Craig A. Benedict".

Craig A. Benedict
Assistant U.S. Attorney
N.D.N.Y. Bar No. 101130